

EXHIBIT 3

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Plaintiff,

v.

NICHOLAS PALUMBO, NATASHA
PALUMBO, ECOMMERCE NATIONAL,
LLC d/b/a Tollfreedeals.com, and SIP
RETAIL d/b/a sipretail.com,

Defendants.

Civil Action No. 20-CV-473

(Komitee, J.)
(Mann, Ch. M.J.)

DECLARATION OF ASHLEA BOWENS

I, Ashlea Bowens, have personal knowledge of the facts set forth below and, if called as a witness, I would testify as follows:

1. I am a Postal Inspector with the United States Postal Inspection Service (“USPIS”). I have been employed as a Postal Inspector since 2012, and am currently assigned to the U.S. Department of Justice (“DOJ”), Consumer Protection Branch to investigate violations of federal criminal law, including mail and wire fraud schemes under Title 18, Sections 1341 and 1343, of the United States Code. Since being employed as a Postal Inspector, I have led, conducted, and participated in criminal investigations involving mail fraud, wire fraud, government impersonation, mail theft, identity theft, assault, robbery, and homicide. I have also successfully completed various training programs provided by the USPIS and the DOJ, including money laundering and asset forfeiture.

2. The facts set forth in this declaration are based on my personal knowledge, knowledge obtained during my participation in this investigation, information from other

individuals including other law enforcement officers, complainants, and other parties, witness interviews, and my review of documents, public records, and other sources. Because this declaration is submitted for the limited purpose of establishing probable cause in support of the application for a temporary restraining order, it does not set forth each and every fact that I have learned during the course of this investigation.

3. In the course of this investigation, I have reviewed documents obtained from telecommunications industry trade association group USTelecom and various telecommunications carriers, as well as documents obtained from Defendants Ecommerce National LLC d/b/a TollFreeDeals.com ("TollFreeDeals") and SIP Retail, LLC d/b/a SIPRetail.com ("SIP Retail") (collectively, the "Corporate Defendants"). Based on the investigation conducted by USPIS, either TollFreeDeals or SIP Retail, and in some cases both, have business relationships with each of the companies and individuals identified in Attachment A. Further, Defendants have received notice at least once, and in some cases dozens of times, from USTelecom or another telecommunications company, that companies and individuals identified in Attachment A have transmitted fraudulent robocalls through TollFreeDeals or SIP Retail, and in some cases through both Corporate Defendants.

Pursuant to 28 U.S.C. § 1746, I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief. Executed on January 30, 2020, in Washington, District of Columbia.



Ashlea Bowens
Postal Inspector
United States Postal Inspection Service